

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF ANNE VAN
AVERY

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

DECLARATION OF ANNE VAN AVERY

I, Anne Van Avery, hereby declare:

I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

I am the Executive Director at the Family Tree Clinic in the City of Minneapolis and State of Minnesota. We are the leading provider of gender affirming care in the State of Minnesota. We are an independent community clinic.

I have spent 25 years in a leadership capacity in non-profit organizations. I have been with the Family Tree Clinic for three years. In my role of Executive Director, I am responsible for carrying out the mission of the organization which is to cultivate a healthy community through comprehensive sexual health care and education.

The Family Tree Clinic was founded in 1971 as a sexual health clinic located in St. Paul to provide services for young women in college that were seeking non-judgmental sexual healthcare, services that no clinics were offering. Family Tree spent four decades in St. Paul. Three years ago, Family Tree Clinic moved to Minneapolis and expanded our care and programs throughout the state and region, building a sanctuary for health awarded international healthcare design awards for being trauma-informed. The building, our programs, and services are based on community listening sessions asking, “where do you finding your healing.” We are now a center for health and education where patients who have experienced trauma and discrimination in other settings are able to experience leading healthcare and education that is welcoming and accessible. We never turn any patient away for lack of ability to pay or health insurance coverage and because of this, we are seeing a tremendous increase in patients coming

from out of state where their care is banned as well as transfers of care from larger systems to seek more accessible healthcare at Family Tree Clinic.

Family Tree Clinic's services include gender-affirming care and sexual and reproductive healthcare. Approximately 70% of the Clinic's work is focused on gender care for youth, adolescent, and adults and 30% is focused on sexual and reproductive healthcare. We serve over 20,000 people a year in both our clinic and health education programs. We reach approximately 15,000 students a year in teaching health education, gender education and healthy sexual relationships. We also provide education to juvenile detention centers, Ramsey and Hennepin County Juvenile Justice schools, as well as Early Childhood Family Education. We are in every public school in St. Paul and many schools in Minneapolis and most suburbs and communities in Minnesota. We also provide outreach and engagement to Black and African communities that include parent classes, HIV and pregnancy prevention, working towards eliminating health disparities in our communities.

With our team of nine providers, we have developed an expertise to care for our patients and follow the guidelines provided by the World Professional Association for Transgender Health (WPATH). These guidelines were developed after a high rigor and efficacy through testing and training and these guidelines are diligently adhered to in our clinic. Nothing is questionable about our treatment; it is directed by the guidelines.

I understand that the President of the United States has issued an Executive Order "Protecting Children from Chemical and Surgical Mutilation," which directs the Office of Management and Budget and each executive department or agency that provides research or education grants to medical institutions, including medical schools and hospitals, to immediately take appropriate steps to ensure that institutions receiving Federal research or education grants

end gender affirming care for individuals under 19 years old (Sec. 4). The Executive Order further directs the Department of Justice to enforce laws against “female genital mutilation” against persons providing or facilitating such care to individuals under 19 years old (Sec. 8). Since the President of United States has issued this Executive Order, we have seen and are experiencing an uptick in our classrooms of gender phobia and trans phobia.

Since the President issued this Executive Order, our providers, as well as our patient resource coordinators are receiving over 100 calls each week concerned that hormone care will be taken away, specifically testosterone and puberty blocker medications. The Executive Order is causing trauma in our community, the fear, anxiety and concern has heightened.

9. Our patients are so concerned that they are wanting to “stockpile medications” concerned they will not be able to get them. We can only prescribe three month or six-month prescriptions, which is mandated by law. Gender care does not just consist of treatment related to gender care, these individuals also need routine healthcare and Family Tree is providing that also as many of these individuals are not comfortable receiving routine care through healthcare providers not experienced in gender care.

10. We have also received many instances of individuals concerned for their lives, they feel they are now in dangerous situations, parents are concerned for their children. Given the rise of anti-trans rhetoric, the communities do not feel like safe places for many of them anymore and the stress and anxiety are causing serious mental health concerns.

I declare under penalty or perjury under the laws of the State of Minnesota and the United States of American that the foregoing is true and correct.

DATED and SIGNED this 5th day of February 2025 at Minneapolis, Minnesota.



Anne Van Avery